

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE: APPLICATION OF TERRABROOK  
LADD UTILITIES LLC,

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No. 99-00509  
EXECUTIVE SECRETARY

ORIGINAL

PETITION TO INTERVENE OF THE CITY OF FRANKLIN

The City of Franklin, Tennessee, ("City") a municipal corporation, hereby files this petition to intervene in the above proceeding, pursuant to T.C.A. §4-5-310, and as grounds, states:

1. The applicant will not be able to meet the standards for issuance of the certificate, as set out in T.C.A. §65-4-203, since there is no showing that the City has refused service to the area sought to be served by the applicant or that the City would be unable to supply service to the area within a reasonable time through additions and extensions to its present system.

2. The area sought to be served by the applicant is within the projected urban growth boundaries of the City, as defined in T.C.A. §6-58-101 et seq. The creation of a private sewer company in the area in question would result in long-term higher costs for future residents. The City would be able to provide the service more efficiently and effectively.

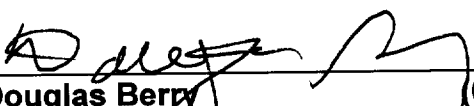
3. The City's legal rights and interest are at stake in and may be determined in this proceeding.

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Respectfully submitted,

**WEED, HUBBARD, BERRY & DOUGHTY**

By:   
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Nashville, Tennessee 37219  
(615) 251-5444

Attorneys for the City of Franklin, Tennessee

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing has been mailed to Thomas V. White, Tune, Entrekin & White, First American Center, 315 Deaderick Street, Nashville, TN 37238, this 27<sup>th</sup> day of January 2000.

